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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

**United States Courts
Southern District of Texas
FILED**

APR 14 2016

David J. Bradley, Clerk of Court

UNITED STATES OF AMERICA,

v.

SHAWN THOMAS POTTS

ROBERT STANLEY CORBITT

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CRIMINAL NO.

UNDER SEAL

16 CR 0147

NOTICE OF RELATED CASES

The United States of America hereby gives notice to the Court that the above-captioned matter is related to another case that was pending in the Southern District of Texas before the Hon. Sim Lake. In *United States v. Barnes, et al.*, Case No. H-10-787-S, two of the defendants charged and convicted in that case were Bernard Langley and Clyde Meltzer. Both were sentenced by Judge Lake and have now been released from prison and are on supervised release (although Langley is currently residing in London).

Meltzer and Langley had engaged in a kickback and money laundering scheme with defendant Barnes who was the crude oil shipping manager at a large oil refining company. Barnes inserted Meltzer and Langley's company into transactions as an unnecessary middleman that would skim money out of the transactions and pay Barnes kickbacks. When arrested, Langley had in his possession a thumb drive that contained ledgers for the Barnes kickback scheme,

along with ledgers for other kickback schemes that he and Meltzer were engaged in. Two other ledgers that were found on Langley's thumb drive tracked kickbacks Meltzer and Langley had paid to a Chevron oil trader named Shawn Potts and to an oil industry consultant named Robert Corbitt. Potts and Corbitt have now been charged in the above-captioned case for engaging in a kickback and money laundering scheme similar to the Barnes scheme. Meltzer and Langley accomplished their scheme with Potts and Corbitt by using many of the same offshore entities and bank accounts they had used to accomplish the Barnes kickback scheme, including Fossil Energy Resources, Gullwing Shipping, CAMAC International, and Tuscan Petroleum. Meltzer and Langley have both been debriefed multiple times regarding the Potts/Corbitt kickback scheme, both are cooperating in that investigation, and both are expected to testify if the Potts/Corbitt case goes to trial.

The United States is therefore requesting that the above-captioned case be consolidated with *United States v. Barnes*, H-10-787-S before the Hon. Sim Lake.

Respectfully submitted,

KENNETH MAGIDSON
United States Attorney
Southern District of Texas

By: 
ROBERT JOHNSON
Assistant United States Attorneys